In the Matter Of:

KULAKOWSKI vs WESTROCK SERVICES

JERRY HARVILLE

November 16, 2017



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NULANUWSKI VS WESTRUCK SERVICES	
IN THE UNITED STATES DIS FOR THE MIDDLE DISTRICT O NASHVILLE DIVISI	F TENNESSEE
MICHAEL KULAKOWSKI,)
Plaintiff,))
vs.))CASE NO.)3:16-CV-02510
WESTROCK SERVICES, INC.,)
Defendant.))
DEPOSITION OF	
JERRY WAYNE HARVI	LLE
Taken on Behalf of the	Plaintiff
November 16, 20	17
Commencing at 12:25	p.m.

Reported by: Jerri L. Porter, RPR, CRR

Tennessee LCR No. 335 Expires: 6/30/2018

1	Page 2 APPEARANCES:	1	Pag The deposition of JERRY WAYNE HARVILLE
2	For the Plaintiff:		
3	HEATHER MOORE COLLINS	2	was taken on behalf of the Plaintiff on November 16,
	Collins & Hunter	3	2017, in the offices of Bone, McAllester & Norton,
4	7000 Executive Center Drive	4	131 Saundersville Road, Suite 130, Hendersonville,
	Building 2, Suite 320	5	Tennessee, for all purposes under the Federal Rules
5	Brentwood, Tennessee 37027	6	of Civil Procedure.
6	(615) 724-1996 heather@collinshunter.com		
7	neather@collinshunter.com	7	The formalities as to notice, caption,
•	For the Defendant:	8	certificate, et cetera, are waived. All objections,
8		9	except as to the form of the questions, are reserved
	MARY DOHNER SMITH	10	to the hearing.
9	NELSON SUAREZ	11	It is agreed that Jerri L. Porter,
	Constangy, Brooks, Smith & Prophete		
0	1010 SunTrust Plaza	12	being a Notary Public and Court Reporter for the
1	401 Commerce Street	13	State of Tennessee, may swear the witness, and that
1	Nashville, Tennessee 37219 (615) 320-5200	14	the reading and signing of the completed deposition
2	mdohner@constangy.com	15	by the witness are reserved.
_	nsuarez@constangy.com	16	27
3	••		
4		17	
5		18	
5		19	
7		20	
3 9		21	* * *
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1		22	
2		23	
3		24	
4		25	
5			
	Page 3		Pag
1	I N D E X	1	JERRY WAYNE HARVILLE
2	INDEX OF EXAMINATIONS	2	was called as a witness, and after having been fir
3	Page	3	duly sworn, testified as follows:
4	Examination By Ms. Collins5	4	EXAMINATION
5	Examination By Ms. Dohner Smith33		
6		5	BY MS. COLLINS:
7		6	Q Good afternoon, I guess it is. Could you
	PREVIOUSLY MARKED EXHIBITS	7	state your complete name for the record.
3	PRESENTED TO WITNESS	8	A Jerry Wayne Harville.
3			
			O Could you spell your last name?
9	Exhibit Description Page	9	Q Could you spell your last name?
9	Exhibit Description Page	9 10	A H-a-r-v-i-l-l-e.
9		9	A H-a-r-v-i-l-l-e.
9	No. 27 8/12/16, 8/15/16, 8/17/16, 8/18/1627	9 10	A H-a-r-v-i-l-l-e. Q Mr. Harville, what is your address?
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KOL	_AROVV	SKI VS WESTROCK SERVICES			
1	right?	Page 6	1	Q But you	Page 8 u worked with Mr. Whited at times over
2	A	No, ma'am.	2	· -	ment center, right?
3	Q	Have you worked at the fulfillment center?	3	A Yes.	3
4	a A	Yes, ma'am.	4		u worked with Mr. Whited at the
5	Q	How long have you been at the main plant?	5	-	nter at times in 2016 and 2015, right?
6	æ A	About seven years now.	6	A Uh-huh	-
7	Q	Would you go over to the fulfillment center?	7		ou were shipping manager, did you work
8	Q A	Yes.	8	around Michael	
9	0	Okay. How often do you go over to the	9	A Yes.	RUIGHOWERI.
10	-	ment center?	10		work around him anymore?
11	A		11	A No.	work around him anymore:
		Well, when I was the shipping manager, I	12		roun gurrent gurerrigen that rou
12	_	o about twice a week.	l		your current supervisor that you
13	Q	All right. What is your current job title?		report to?	P.J.
14	A	Forklift operator.	14	A Larry l	
15	Q	How long have you been in that job?	15	·· -	ou ever seen Mr. Whited hit another
16	Α	About nine or ten months. Ever since they		employee?	
17	•	of Tommy.	17	A Yes, ma	a'am.
18	Q	Did you get moved over there after he was	18	Q Who?	
19	termina		19		l Kulakowski.
20	A	Over?	20	Q Anyone	
21	Q	Over to the main plant.	21	A Mike E	
22	A	No. I was already at the main plant.	22	Q Who ela	se?
23	Q	Okay. I guess I'm confused. Are you at the	23	A Me.	
24	fulfill	ment center now?	24	Q Who ela	se?
25	A	No.	25	A That's	all I can remember right now.
		Page 7			Page 9
1	Q	Okay.	1	Q Okay.	Have you seen Mr. Whited kick another
2	A	I was the shipping manager when he got	2	employee?	
3	termina	ted.	3	A Yes, ma	a'am.
4	Q	Okay.	4	Q Who?	
5	A	And then when the new general manager come	5	A Michael	l Kulakowski, Mike Eden. That's it.
6	in, the	y done some changing, so	6	Q Is Mike	e Eden related to Larry Eden?
7	Q	Okay. So you were the shipping manager at	7	A Yes, ma	a'am.
8	the mai	n plant?	8	Q What is	s their relation?
9	A	Uh-huh.	9	A First o	cousins.
10	Q	And when you were shipping manager, that's	10	Q Does he	e still work out there, Mike Eden?
11	when yo	u would come over to the fulfillment center?	11	A Yes, ma	a'am.
12	A	Yes, ma'am.	12	Q What's	his job?
13	Q	Is your current position a demotion?	13	A Forkli	ft operator.
14	A	I guess you could call it that, yes.	14	Q Is he a	at the fulfillment center or the main
15	Q	Is it less pay?	15	plant?	
16	A	No.	16	A Main p	lant.
17	Q	Who was that, the new general manager that	17	Q Now, to	ell me about the times that you've
18	put you	in that position?	18	seen Mr. White	d hit Michael Kulakowski.
19	A	Al Holbrook (phonetic), or something like	19	A I mean	, I don't remember the dates or any
20	that.	I don't really know his last name. Just know	20	times or anyth:	ing like that. They would be standing
21	his nam	ne is Al.	21	there like hav:	ing a conversation, and he would just
22	Q	And the current GM is Keith Hall, right?	22	kick him in the	e nuts.
23	A	No. He's plant supervisor.	23	Q Have yo	ou seen did you see Mr. Whited do
1	Q	Okay.	24	that on more th	han one occasion to Mr. Kulakowski?
24	×				
24 25		Al is the current GM.	25	A No.	

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_	Page 10		Page 12
1	Q What about hitting him in the groin area?	l .	Q Did it seem like Mr. Kulakowski was scared
	A Yes.	2	of Mr. Whited?
3	Q Yes? Did you see that on more than one	3	A Yes. I don't know if you call it scared or
	occasion?	4	intimidation.
	A Yes, ma'am.	5	Q And you also said that you saw Mr. Whited
6	Q What was Mr. Kulakowski's reaction?	6	kick Mr. Eden. Was that also in the groin area?
7	A He'd just cover. I mean, you know, the	7	A Yes, ma'am.
	natural.	8	Q Was that just one time or more than once?
9	Q Did he seem like he was in pain?	9	A Just once.
	A Yes, ma'am.	10	Q What did Mr. Eden do when that happened?
11	Q Did he seem like he was in pain when		A He hit him back. Not in the groin, but he
12	Mr. Whited when you saw Mr. Whited kick him in	12	punched him and told him don't ever do it again.
13	the groin area?	13	Q And you said that he had hit you before,
14	A Yes, ma'am.	14	that Mr. Whited had hit you before, right?
15	Q Did he say anything to Mr. Whited did	15	A Yes, ma'am.
16	Mr. Kulakowski say anything to Mr. Whited when those	16	- ·
17	things would happen?	17	3
18	A He would say stuff like dammit, Tommy, don't	18	Q What did you do when he would do that?
19	do that, or something like that.		A Not all the time, every time, but most of
20	Q Okay. Would Mr. Whited quit doing it?	1	the time I would punch him back.
21	A Uh-huh.	21	Q Did you tell him not to do it?
22	Q But he would come back and do it again?	22	A Yes, ma'am.
23	A Maybe, you know, two or three days later or	23	Q But he would do it again?
24	week later or two weeks, whatever.		A Maybe later on, you know. I don't know if
25	Q Did you see Mr. Whited hit or kick Michael	25	you call it horseplay or what you call it, really.
	Page 11		Page 13
1	Kulakowski anywhere besides the groin area?	1	Q But he did it more than once to you?
2	A Not kick, no.	2	A Yes.
3	Q What about hit?	3	Q And you would tell him to stop?
4	A Yeah.	4	A Yes, ma'am.
5	O When also did we him his him?	=	
l	Q Where else did you see him hit him?	5	Q Did you ever see Mr. Whited hit
6	A I mean, I've seen him I guess you could	6	Q Did you ever see Mr. Whited hit Mr. Kulakowski with a broom or another object?
7	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something	_	Mr. Kulakowski with a broom or another object? A No.
7	A I mean, I've seen him I guess you could	6	Mr. Kulakowski with a broom or another object?
7	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something	6 7	Mr. Kulakowski with a broom or another object? A No.
7 8	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like	6 7 8	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten
7 8 9	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that.	6 7 8 9	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job?
7 8 9 10	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen	6 7 8 9	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes.
7 8 9 10 11 12 13	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than	6 7 8 9 10 11	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that.
7 8 9 10 11 12 13	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh.	6 7 8 9 10 11 12	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that.
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7 8 9 10 11 12 13 14	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry?	6 7 8 9 10 11 12 13 14 15	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall.
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7 8 9 10 11 12 13 14 15 16 17 18	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry? A Just that one time. Q Did he hit him in the groin area as well?	6 7 8 9 10 11 12 13 14 15 16 17	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall. Q Like would it be within the year before he was fired? A Yeah, probably.
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7 8 9 10 11 12 13 14 15 16 17 18 19 20	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry? A Just that one time. Q Did he hit him in the groin area as well? A Yes. Q What did Mike Eden do?	6 7 8 9 10 11 12 13 14 15 16 17 18 19	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall. Q Like would it be within the year before he was fired? A Yeah, probably. Q Was it something you heard on more than one occasion?
7 8 9 10 11 12 13 14 15 16 17 18 19 20	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry? A Just that one time. Q Did he hit him in the groin area as well? A Yes. Q What did Mike Eden do? A Hit him back. Told him don't ever do it again.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall. Q Like would it be within the year before he was fired? A Yeah, probably. Q Was it something you heard on more than one occasion? A Yes.
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry? A Just that one time. Q Did he hit him in the groin area as well? A Yes. Q What did Mike Eden do? A Hit him back. Told him don't ever do it again.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall. Q Like would it be within the year before he was fired? A Yeah, probably. Q Was it something you heard on more than one occasion? A Yes. Q Had you heard Mr. Whited threaten other
7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23	A I mean, I've seen him I guess you could count it, but he'd knock his cap off or something like that, or punch him on the arm or something like that. Q And you also mentioned that you had seen Mr. Whited do that to Mike Eden? A Uh-huh. Q Did you see him hit Mike Eden on more than one occasion? A No. Just that one time. Q I'm sorry? A Just that one time. Q Did he hit him in the groin area as well? A Yes. Q What did Mike Eden do? A Hit him back. Told him don't ever do it again. Q Did you ever hear Mr. Kulakowski or did you ever see Mr. Kulakowski hit Mr. Whited back?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Mr. Kulakowski with a broom or another object? A No. Q Did you ever hear Mr. Whited threaten Mr. Kulakowski with his job? A Yes. Q Tell me about that. A Well, I mean, if you don't straighten up, I'll fire your ass, just stuff like that. Q When was that? A I don't recall. Q Like would it be within the year before he was fired? A Yeah, probably. Q Was it something you heard on more than one occasion? A Yes. Q Had you heard Mr. Whited threaten other employees that he would fire them?

	ANOWSKI VS WESTNOCK SERVICES		
1	Page 14 Q Okay. Do you recall Mr. Whited telling any	1	Page 16 company hotline?
2	employees that if they made a complaint about him,	2	A No, ma'am.
3	he'd find out about it and fire them, anything like	3	Q Did you ever see any posters in the
4	that?	4	workplace down at the fulfillment center about the
5	A No.	5	company hotline?
6	Q Who was the before Mr. Whited was	6	A I couldn't tell you, because I don't even
7	terminated, who was the HR person out at the	7	know where the boards are at, I mean. They've
8	Gallatin plants?	8	changed a bunch of stuff around so much.
9	A As far as we knew, Helen Kendall.	9	Q I understand. You had some dealings with
10	Q When you worked out at the Gallatin plants,	10	Terri Henley, right?
11	before Mr. Whited was investigated and eventually	11	A Terri Henley, yes.
12	terminated, had you received any sort of training on	12	Q Was the first time you dealt with her in
13	sexual harassment?	13	connection with the Whited investigation?
14	A Yes.	14	A No. I think the first time I actually
15	Q Okay. Tell me about that.	15	talked to her was when I fell on my shoulder.
16	A We would just have a company meeting and put	16	Q Okay. What was your understanding of her
17	a slide show up and they would read it and talk	17	what her job was when you hurt your shoulder?
18	about it and give out the numbers and stuff.	18	A I thought she was safety. I didn't know.
19	Q Who would put the slide show up?	19	Q Okay. Were you just told you had to deal
20	A Most of the time it would either be our	20	with your shoulder injury through her?
21	safety lady or somebody like that.	21	A No. I mean, when it happened, I mean, they
22	Q Who was the safety lady?	22	sent me to the doctor and stuff and everything. She
23	A It was Lana Potts, but she's not there no	23	came up and was investigating how it happened and
24	more.	24	stuff like that.
25	Q Do you recall anybody else besides Lana	25	Q When was that?
	Page 15		Page 17
1	doing it?	1	A Two years ago, January.
		_	
2	A No. She was pretty much the one that did it	2	Q How often do you receive the company
3	all.	3	policies or handbook?
3 4	all. Q Was that just at the main plant that you	3 4	policies or handbook? A Oh, probably once a year.
3 4 5	all. Q Was that just at the main plant that you recall that happening or at the fulfillment center?	3 4 5	policies or handbook? A Oh, probably once a year. Q When you receive them, do you sign a piece
3 4 5 6	all. Q Was that just at the main plant that you recall that happening or at the fulfillment center? A Now, I know we did it at the main plant. I	3 4 5 6	policies or handbook? A Oh, probably once a year. Q When you receive them, do you sign a piece of paper saying you received them?
3 4 5 6 7	all. Q Was that just at the main plant that you recall that happening or at the fulfillment center? A Now, I know we did it at the main plant. I don't know if they did it at the fulfillment.	3 4 5 6 7	policies or handbook? A Oh, probably once a year. Q When you receive them, do you sign a piece of paper saying you received them? A Yes, ma'am.
3 4 5 6 7 8	all. Q Was that just at the main plant that you recall that happening or at the fulfillment center? A Now, I know we did it at the main plant. I don't know if they did it at the fulfillment. Q Okay. When Tommy Whited still worked there,	3 4 5 6 7 8	policies or handbook? A Oh, probably once a year. Q When you receive them, do you sign a piece of paper saying you received them? A Yes, ma'am. Q Are you required
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	all. Q Was that just at the main plant that you recall that happening or at the fulfillment center? A Now, I know we did it at the main plant. I don't know if they did it at the fulfillment. Q Okay. When Tommy Whited still worked there, did he spend most of his time at the fulfillment center? A Yes, ma'am. Q And that was when you were just going down there occasionally, right? A Uh-huh. Q Before the things happened with Tommy Whited, before that investigation, did you know there was a company hotline? A Yeah, I knew there was one. Q What was your understanding what that was for? A For any kind of misconduct or anything going on in the plant. Q Did you ever use the company hotline? A No, ma'am.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	policies or handbook? A Oh, probably once a year. Q When you receive them, do you sign a piece of paper saying you received them? A Yes, ma'am. Q Are you required A That we read them and stuff. Q Right. Are you required to read them at that time? A Yes. Q How long do you have to read them? A Most of the time they give you a week. Q Okay. And was that how it was at the main plant? A Uh-huh. Q Had you ever had to deal with that at the fulfillment center? A No, ma'am. Q Now, when you said that when Tommy Whited would hit you you would lose your job because you hit him back?

KUL	AKOWSKI vs WESTROCK SERVICES		
1	Page 18 Q Had you ever seen Tommy Whited hit or grab	1	Page 20 Just kind of blew it off.
2	or kick a woman in the groin area?	2	Q Right. Now, other than hitting and kicking
3	A No.	3	you in the groin area, did he ever grab you?
4	Q Had Michael Kulakowski ever told you that he	4	MS. DOHNER SMITH: Objection.
5	complained to Larry Eden about the way Mr. Whited	5	BY MS. COLLINS:
6	was treating him?	6	Q Did Mr. Whited ever grab you in your
7	A No.	7	testicles or the groin area?
8	Q Had you ever heard him complain to Larry	8	A No.
9	Eden about the way Mr. Whited was treating him?	9	Q And by hitting, how would he hit how did
10	A No.	10	he hit you? How did Mr. Whited hit you?
11		11	A Like backhand.
l			
12	private parts to you?	12	Q Backhand you in your penis?
13	A No.	13	A He'd be standing beside of me and just
14	Q Okay. Has he ever requested oral sex or	14	(indicating), you know.
15	anything in that manner from you?	15	Q Still painful
16	A No.	16	A Yeah.
17	Q Have you ever heard of him doing either of	17	Q as I understand it to men.
18	those things to any other male employees?	18	A Yes.
19	A I've not seen him actually pull anything	19	Q Other than the time that you spoke with
20	out, but I've seen him grab his zipper and state	20	Ms. Henley for your workers' comp injury or your
21	stuff like that.	21	shoulder injury, had you spoken with her any other
22	Q To who?	22	time besides the Whited investigation?
23	A Michael Kulakowski.	23	A I mean, the only time I spoke to her was
24	Q Like what did he state? I need you to say	24	about my arm and then the Whited investigation.
25	what he said. I know it could be crude.	25	Q Okay. Do you think Tommy Whited was capable
	Page 19		Page 21
1	A He said, I'll just he'd pull it and out	1	of harming someone?
2	and say suck my privates.	2	MS. DOHNER SMITH: Objection.
3	Q Would he say suck my dick?	3	BY MS. COLLINS:
4	A Yes, ma'am.	4	Q Based on your interactions with him?
5	Q To Michael Kulakowski?	5	A I really don't know.
6	A Yes.	6	Q But Michael Kulakowski expressed to you that
7	Q And you witnessed that?	7	he was afraid of him?
8	A Yes.	8	A Yes.
9	Q Would he actually pull it out or would he	9	Q Did he say why?
10	just	10	A It was just intimidation, the way he
11	(Overlapping speech.)	11	controlled hisself, I guess.
12	A I've never seen him pull it out.	12	Q Were you afraid to report the way Mr. Whited
13	Q But you did see him shake his zipper at him?	13	was treating you?
1		14	A Yes.
14	A Yes, ma'am.		
14 15	Q And tell him to suck his dick?	15	Q Why?
	Q And tell him to suck his dick?	15 16	Q Why? A I had to make a living.
15	Q And tell him to suck his dick?		
15 16 17	Q And tell him to suck his dick? A Yes, ma'am. Q What did Mr. Kulakowski do?	16	A I had to make a living.
15 16 17 18	Q And tell him to suck his dick? A Yes, ma'am. Q What did Mr. Kulakowski do? A I really can't recall what he said, to be	16 17	A I had to make a living. Q Did anyone else express having the same fears or concerns to you?
15 16 17 18 19	Q And tell him to suck his dick? A Yes, ma'am. Q What did Mr. Kulakowski do? A I really can't recall what he said, to be honest with you.	16 17 18 19	A I had to make a living. Q Did anyone else express having the same fears or concerns to you? A I mean, people had talked about it, but I
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	AKOWSKI VS WESTROCK SERVICES		
1	Page 2 A Yes.		Page 24 A Your supervisor or team members or job
2	Q And why was that?	2	performance. Just different stuff.
3	A I was afraid of losing my job.	3	
4	Q Have you ever done some kind of survey out	4	talking about the way Mr. Whited hit people or
5	at the fulfillment center?	5	kicked people in one of those surveys?
6	A Survey? What do you mean?	6	MS. DOHNER SMITH: Objection.
			_
7	Q I don't know. An employee survey of any kind?	7	THE WITNESS: I didn't really see a
8		8	place in there.
9	A We've done them at the plant. They would	9	BY MS. COLLINS:
10	give out these books. You do a survey for, I guess		Q Okay. Do you think it would have helped
11	both facilities.	11	things with respect to Mr. Whited's behavior if
12	Q Okay. Would you just get one of those at	12	there would have been an HR person that was
13	the main plant or had you ever received one at the	13	MS. DOHNER SMITH: Objection.
14	fulfillment center?	14	BY MS. COLLINS:
	A Well, it was for both plants.	15	Q available out at the plants?
16	Q Okay. Was that mandatory?	16	A I don't really know what you're asking.
	A Supposedly, yes.	17	•
18	Q Okay. Did you fill those out?	18	Did you ever complain to Helen about
19	A Yes.	19	Mr. Whited?
20	Q Did you know where they went, where those	20	A No.
21	surveys went?	21	Q Why not?
22	A I just know they I guess went to	22	A I just the less you say, the better off
23	corporate, I guess.	23	you are.
24	Q Did anybody come out and give you	24	Q The less you say, the better off you are?
25	instructions on the surveys or anything like that?	25	A Uh-huh.
	Page 2	3	Page 25
l -			
1	How did that come out?	1	Q Did it seem like a lot of other people felt
2	How did that come out? A I mean, they just give us you know,		Q Did it seem like a lot of other people felt the same way?
2	A I mean, they just give us you know,	2 3	the same way?
2 3	A I mean, they just give us you know, here's a survey, fill it out to the best of my	2 3	the same way? MS. DOHNER SMITH: Objection.
2 3 4	A I mean, they just give us you know, here's a survey, fill it out to the best of my knowledge, how you feel, date it, and then turn the	2 3 1	the same way? MS. DOHNER SMITH: Objection. THE WITNESS: (Witness moves head up
2 3 4 5	A I mean, they just give us you know, here's a survey, fill it out to the best of my knowledge, how you feel, date it, and then turn the in.	2 3 m 4 5	the same way? MS. DOHNER SMITH: Objection. THE WITNESS: (Witness moves head up and down.)
2 3 4 5 6 7	A I mean, they just give us you know, here's a survey, fill it out to the best of my knowledge, how you feel, date it, and then turn the in. Q Who would tell you about that, these	2 3 4 5 6	the same way? MS. DOHNER SMITH: Objection. THE WITNESS: (Witness moves head up and down.) BY MS. COLLINS:
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A I mean, they just give us you know, here's a survey, fill it out to the best of my knowledge, how you feel, date it, and then turn the in. Q Who would tell you about that, these surveys? A I mean, they would have a company meeting. Q Who would have the company meeting? A Oh, Lord. I guess most of the time it would be Larry or somebody like that. Q Okay. A Upper management. Q Did anybody ever tell you that Mr. Whited would get the survey results? A No. Q And did you fill those surveys out? A Yes. Q Did you ever complain about Mr. Whited's behavior in one of those surveys? A No.	2 3 4 5 6 7 8 9 11 12 13 14 15 16 17 18 19 20 21 22 23	MS. DOHNER SMITH: Objection. THE WITNESS: (Witness moves head up and down.) BY MS. COLLINS: Q Is that a yes? A Yes. Q Were you ever present on an occasion where Mr. Kulakowski was hit or kicked and Larry Eden witnessed it? A No. Q Did Larry Eden ever witness you getting hit or kicked? A I can't recall who was standing there when he hit me in the office that day. I know there was a couple people there, but I can't remember who they were. Q Okay. What about Mike White? Do you remember if he was around? A No. Q Did you get called in on the weekends sometimes, weekends or nights, and be expected to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A I mean, they just give us you know, here's a survey, fill it out to the best of my knowledge, how you feel, date it, and then turn the in. Q Who would tell you about that, these surveys? A I mean, they would have a company meeting. Q Who would have the company meeting? A Oh, Lord. I guess most of the time it would be Larry or somebody like that. Q Okay. A Upper management. Q Did anybody ever tell you that Mr. Whited would get the survey results? A No. Q And did you fill those surveys out? A Yes. Q Did you ever complain about Mr. Whited's behavior in one of those surveys? A No. Q Was there a place in one of those surveys where you could have brought that up? A No.	2 3 4 5 6 7 8 9 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MS. DOHNER SMITH: Objection. THE WITNESS: (Witness moves head up and down.) BY MS. COLLINS: Q Is that a yes? A Yes. Q Were you ever present on an occasion where Mr. Kulakowski was hit or kicked and Larry Eden witnessed it? A No. Q Did Larry Eden ever witness you getting hit or kicked? A I can't recall who was standing there when he hit me in the office that day. I know there was a couple people there, but I can't remember who they were. Q Okay. What about Mike White? Do you remember if he was around? A No. Q Did you get called in on the weekends

	ANOWSKI VS WESTROCK SERVICES		
1	Page 26 Q Okay. Did you complain about that at some	1	Page 28 A Just regular reading glasses.
	point in time or do you recall complaining about	2	Q I've already had to loan them to one other
3	that?	3	witness. It's fine.
4	A Me?	4	If you could turn down at the bottom of
5	Q Yes.	5	the page, it's got numbers. If you could turn to
6	A No.	6	the one that says WestRock 211 down at the bottom.
7	Q Are you still in touch with Tommy Whited?	7	A (Witness complies.)
8	A No.	8	Q And about midway down, it has your name
9	Q Did you buy any cars or anything from him?	9	under a line.
10	A No, I have not.	10	A Uh-huh.
11	Q Okay. Do you recall a situation where	11	Q If you could just read that section under
12	Mr. Whited said you weren't going to get out of	12	your name, and it goes into the next page, let me
13	shipping unless he fired you?	13	know when you're done reading it. Just read to
14	A Me?	14	yourself.
15	Q Yes.	15	A Read what now?
16	A Yeah, he's told me that before.	16	Q Just read what's under your name, just read
17	Q How did he tell you that? Or what was the	17	that. And it goes a little bit into the next page.
18	context of the situation?	18	Then when you're done reading it, just let me know
19	A Well, it was basically, once you become a	19	when you're finished. I'm going to ask you some
20	manager, your next step is out the door.	20	questions about those notes.
21	Q What do you mean by that?	21	A (Reviewing document.)
22	A I mean, that's just what we've heard him say	22	The whole rest of the page under Larry?
23	in the past. And what's happened over the past with	23	Q Oh, no. Just the top part that was for you.
24	some other people, when they go up in the office,	24	Does this look generally like what you told
25	then their next step would be out the door.	25	Ms. Henley when she came out to the plant?
	Page 27		Page 20
1		_	Page 29
	what do you mean, go up in the office:	I	A Yes.
2	A Like move up from the floor to the office.	2	A Yes. Q Where did you meet with her?
2 3		l .	
3	A Like move up from the floor to the office.	2	Q Where did you meet with her?
3	A Like move up from the floor to the office. Q Okay. So people that would get a manager	3	Q Where did you meet with her? A the conference room.
3 4	A Like move up from the floor to the office. Q Okay. So people that would get a manager position, they would	2 3 4	Q Where did you meet with her? A At the conference room. Q At the main plant?
3 4 5	A Like move up from the floor to the office. Q Okay. So people that would get a manager position, they would A lot of times their next step was out the	2 3 4 5	Q Where did you meet with her? A At the conference room. Q At the main plant? A Yes, ma'am.
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25 people as much, whether it's fishing or numting or 25 didn't straighten up, 1:11 fire your ass. What was		· ·	l	
	45	people as much, whether it's fishing of numering or	45	didn't stranghten up, i'il fire your ass. what was

Page 34 Page 36 1 he referring to? Had Mr. Kulakowski done something 1 is out the door, when you took on shipping, your wrong or made a mistake on the job? next step was out the door. That was in relation to you getting the A lot of it is just he wouldn't -- hadn't done it his way or how he thought it should have shipping supervisor position and you didn't want it 5 been handled. and Tommy didn't have anything else for you? Is Okay. So that was in reference to how that what you --6 0 6 Mr. Kulakowski was performing his job? Α No, no, that's not what I meant. 7 MS. COLLINS: Objection to form. Okay. What did you mean? 9 BY MS. DOHNER SMITH: Over the years past, by other people, The threats to fire? Tommy didn't like the usually when they would go to the office, usually 10 10 11 way Mr. Kulakowski was doing his job, or wasn't their next step would be out the door. 11 12 doing it Tommy's way? 12 Who? MS. COLLINS: Objection to form. 13 Just people that's worked there before. 13 THE WITNESS: Yeah, I mean, just -- I Were they fired or did they quit? 14 14 really don't know how to put it. It would probably 15 Some quit and some just, you know, didn't 15 Α be half and half. Just aggravation and just doing 16 16 have nothing for them to do. 17 his job, too. Just to be a smart aleck. 17 Okay. So you're not saying that Tommy BY MS. DOHNER SMITH: promoted people so he could fire them? 18 19 Do you know what Helen Kendall's actual job 19 title was? You testified that Tommy would yell and cuss 20 20 21 A at employees. That's something he did in front of No, not really. 21 22 Q Okay. You said that you saw Mr. Whited grab all of the employees, correct? his zipper and say something along the lines of suck 23 23 I mean, he done it in front of people, yeah. Α 24 my dick. 24 Okay. And there would be female employees 25 A Uh-huh. around when he would yell and cuss? Page 35 Page 37 When was that? I don't know so much about that. 1 0 1 Α 2 Α Oh, I don't recall the date or time or 2 Okay. There are females on the floor working, right? 3 anything. How long before Mr. Whited was terminated? Yes. 4 Q 4 Α 5 Α I really don't know, to be honest with you. 5 And he would yell and cuss on the floor? Did you only see that one time? MS. COLLINS: Objection to form. 6 Q 6 7 Α Yes, ma'am. 7 THE WITNESS: Yes, he has. Earlier you said you didn't think it would BY MS. DOHNER SMITH: Okay. If Tommy Whited was terminated after do any good to complain about Tommy. Somebody made 9 a complaint about Tommy, correct? this investigation, why do you still feel that if 10 you had reported him you would have lost your job? 11 MS. COLLINS: Objection to form. THE WITNESS: If he did, I don't know. 12 MS. COLLINS: Objection to form. 12 13 BY MS. DOHNER SMITH: THE WITNESS: You're talking about now? 13 14 The company came in to do an investigation BY MS. DOHNER SMITH: 15 into Tommy, correct? 15 0 Yes. 16 Α Yes. 16 I don't feel that way now. Α And shortly after the investigation, Tommy 17 17 0 Oh, okay. 18 was no longer employed at WestRock, correct? 18 He's no longer there. 19 Yes. Okay. So sitting here today, you think if 19 20 Do you have any knowledge of anybody making you had reported him in the past, you wouldn't have 21 a complaint about Tommy and then actually being 21 been fired? 22 22 terminated by him? MS. COLLINS: Objection to form. 23 A 23 THE WITNESS: I don't really know what 24 Okay. I just want to clarify your testimony 24 would have happened, to be honest. regarding when you become a manager your next step 25

	LANOVON VS WESTNOON SERVICES			
1	Page 38 BY MS. DOHNER SMITH:	1	P REPORTER'S CERTIFICATE	age 40
2	_	2		
	Q Okay.	3	I, Jerri L. Porter, RPR, CRR, Notary	
3	A I was just scared to say anything because	4	Public and Court Reporter, do hereby certify that I	
4	wasn't	5	recorded to the best of my skill and ability by	
5	Q You said that Mr. Kulakowski doesn't do as	6	machine shorthand all the proceedings in the	
6	much as he used to. Did that start when he started	7	foregoing transcript, and that said transcript is a	
7	having back problems?	8	true, accurate, and complete transcript to the best	
8	MS. COLLINS: Objection to form.	9	of my ability.	
9	BY MS. DOHNER SMITH:	10	I further certify that I am not an	
10	Q He hurt his back a few years ago?	11	attorney or counsel of any of the parties, nor a	
11	A Yeah, for a little while. And then, you	12	relative or employee of any attorney or counsel	
12	know, it got better, and he seemed like he was his	13		
13	old self. But now I guess he's hurting again. I		connected with the action, nor financially interested in the action.	
14	don't really know. Like I said, I hadn't talked to	14		
15	him in a month-and-a-half.	15	SIGNED this 28th day of November, 2017	•
16	Q Okay.	16		
17	A Well, worked with him for a	17		
18	month-and-a-half.	18		
		19	Chair I I X	
19	•	20	7/10/2. 033	
20	paranoid. You said, I guess, but not around him.	21	Jerri L. Porter, RPR, CRR	
21	Have you witnessed him doing anything that you would	22	My Notary commission expires: 2/19/2018	
22	consider he's paranoid?	23	Tennessee LCR No. 335	
23	A He's just a nervous guy. I mean, he's real		Expires: 6/30/2018	
24	nervous. But the least little thing upsets him.	24		
25	Q Has he always been that way, a nervous guy?	25		
	Page 39		P	age 41
1	A Not as bad when he first started. But the	1	ERRATA	
2	longer he stayed, the worse it got.	2		
3	Q Okay. Did Mr. Kulakowski ever tell you that	3	I, JERRY WAYNE HARVILLE, having read the	
4	he had made a complaint to anybody in HR, the		foregoing deposition, Pages 1 through 39, taken	
5	corporate office, about Mr. Whited?	4	November 16, 2017, do hereby certify said	
6	A No.	_	testimony is a true and accurate transcript,	
7	MS. DOHNER SMITH: I think that's it.	5	with the following changes, if any: PAGE LINE SHOULD HAVE BEEN	
8	MS. COLLINS: I'm done.	7	FAGE DINE SHOOLD HAVE BEEN	
9	FURTHER DEPONENT SAITH NOT.	8		
	(Proceedings concluded at 1:15 p.m.)	9		
10	(Proceedings concluded at 1:15 p.m.)	10		
11		11		
12		12		
13		13		
14		14		
15		15		
16		16		
17		17		
18		18		
19		19	JERRY WAYNE HARVILLE	
20		20		
21		21		
22		~~	Notary Public	
23		23	My commission expires:	
24		24		
25		25		
ı		1		